

DOCKET 01-AFC-19
DATE SEP 05 2003
RECD: SEP 05 2003

PROOF OF SERVICE (REVISED 2/24/03) FILED WITH
ORIGINAL MAILED FROM SACRAMENTO ON 9/5/03 80

STATE OF CALIFORNIA
State Energy Resources
Conservation and Development Commission

In the matter of:

DOCKET NO: **01-AFC-19**

Application for Certification)
of SMUD CONSUMNES)
Power Plant Project)
)

Intervener Kathryn Peasha's.
Comments on the
Presiding Member's
Proposed Decision.

September 5, 2003

The PMPD on the SMUD Cosumnes Power Plant should be denied because the Carson Ice-Generation Site is Clearly a More Feasible Site.

Analysis and Argument

Power plants have the greatest potential for significant environmental impacts in the following areas: air quality, biological resources, cultural resources, noise, transmission system engineering, visual resources, water resources. (1: PMPD pg. 212). Thus, these issue areas were evaluated in the PMPD for each alternative site considered. The PMPD is clear: **when comparing the Carson Ice-Generation site with the PMPD's proposed CCP site, there are fewer impacts at Carson.**

Air Quality

Assuming the same design and engineering criteria (which would be the same for CPP and the Carson Ice-Generation site) the air quality impacts would not change. In other words, there is no change in air quality impact when either site is considered.

Biological Resources

Due to the location of CPP near existing infrastructure, there are many the biological impacts associated with the 26-mile pipeline construction, such as frac-outs and crossing different habitat types impacting more species. Elimination of the 26 mile natural gas pipeline to CPP – which would occur if Carson were chosen – would reduce impacts to wetlands. (2: PMPD pg.213).

The PMPD's analysis shows that when all alternative sites are considered, the Carson Ice-Generation site results in the fewest biological impacts (3: PMPD pg. 213)

Cultural Resources

It appears that the proposed CPP area has both prehistoric and historic resources needing protection. Although the current 500MW option before the Energy Commission for licensing would likely impact fewer resources because it would not include the 26 mile pipeline. (4: PMPD pg. 213).

Noise

Given that noise from the existing Carson Ice-Generation power plant is sufficiently controlled so that there are few complaints received concerning it's operation, it appears technically feasible to design a plant for Carson which would not result in a significant noise impact. This site would have less noise impact than the proposed site. (5: PMPD pg. 214).

System Engineering

For a 500 MW generating plant (currently or what SMUD is licensing) the plant could connect to an existing double circuit 230W transmission line...(6. PMPD pg. 214).

The site would have greater transmission system engineering impacts (but only for 1000 MW.) (7: PMPD pg. 214).

Visual Resources

When considered within the existing landscape, a power plant at the Carson alternative site would cause an adverse, but not significant, visual impact. (8: PMPD pg. 215).

The visual impact at CPP is more of an impact with the existing towers. To reduce the impact, SMUD should fully decommission Rancho Seco Nuclear Facility, including the removal of the towers.

Water Resources

SWRCB (State Water Resources Control Board) Policy 75-78 discourages the use of fresh water for power plant cooling and prioritizes the source of water for power plant cooling. (9: PMPD, (LORS) (State) pg. 210).

The SRWTP (Sacramento Regional Waste Water Treatment Plant) operates a 5 million gallon per day (gpd) water recycling facility adjacent to the Carson site. Sufficient recycled water would be available to operate a power plant at the Carson site thereby reducing water impacts and saving fresh water resources. (10: PMPD pg. 212-213).

Cost Analysis

Comparing cost of improving the Carson Site to the cost of constructing the CPP 26-mile natural gas pipeline

While a power plant at the Carson Ice-Generation site would be subject to flooding, a 25 acre power plant at this site would require the import of 40,000 to 80,000 cubic yards of fill for flood protection. The cost per cubic yard of fill is approximately \$12.00 per cubic yard. At the highest estimate of cost for fill, this would be less than 1 million dollars.

On the other hand, cost of the natural gas pipeline is estimated to be \$20 million dollars.

The pipeline has other drawbacks, weather permitting work, escalated mitigation factors (which still are not resolved) and unknowns which increase the cost.

While the costs of facilities are borne by the municipality, they are passed on to the customers through rates.

The rate payers of SMUD prefer to have low rates and therefore, SMUD should use the best feasible site for the power plant.

A "valued engineering clause" should also be adopted in the contract of building the power plant. This would benefit the rate payers which I believe are not clearly aware of what SMUD is spending on the CPP.

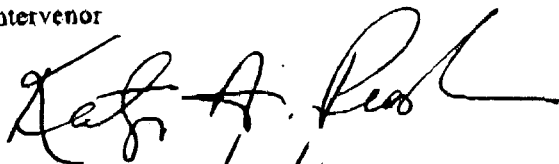
Safety

While the PMPD considered the proceeding topics when evaluating the feasibility of alternative sites, the PMPD fails to take into consideration the area of safety.

The Carson Ice-Generation site is about 15 miles from the fire station which will function as the first response station for a hazardous material event. The response time to the CPP site is estimated at 30 minutes.

While it is clear the volunteer fire department near the proposed CPP site is inadequately equipped, the Carson Ice site has a fire protection/hazmat facility with an estimated response time of about 2 minutes.

Kathryn A. Peasha
Intervenor


9/5/03

BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT
COMMISSION OF THE STATE OF CALIFORNIA

In the Matter of:

Application for Certification for the
SMUD COSUMNES POWER PLANT

Docket No. 01-AFC-19

PROOF OF SERVICE
(Revised 2/24/03)

I, **SUNITA NAGIN**, declare that on **SEPTEMBER 5, 2003**, I deposited copies of the **INTERVENER KATHYRN PEASHA'S COMMENTS REGARDING PRESIDING MEMBERS PROPOSED DECISION** in the United States mail at *Sacramento, CA* with first class postage thereon fully prepaid and addressed to the following:

DOCKET UNIT

*Send the original signed document plus
the required 12 copies to the address
below.*

CALIFORNIA ENERGY COMMISSION
DOCKET UNIT, MS-4
Attn: Docket No. 01-AFC-19
1516 Ninth Street
Sacramento, CA 95814-5512

* * * *

In addition to the documents sent to the
Commission Docket Unit, also send
individual copies of any documents to:

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I declare under penalty of perjury that the foregoing is true and correct


[signature]